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Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Windy City Cellular, LLC
Second Progress Report
E911 Location Accuracy, PS Docket No. 07-114

Dear Ms. Dortch:

Pursuant to Section 20.18(i)(4)(ii) of the Commission's Rules, Windy City Cellular, LLC ("Windy City") hereby submits its second progress report on implementation of indoor location accuracy improvements.

Please contact the undersigned counsel should you have any questions.

Very truly yours,



D. Cary Mitchell
Its Counsel

Windy City Cellular, LLC

E911 Location Accuracy Progress Report

47 C.F.R. § 20.18(i)(4)(ii)

PS Docket No. 07-114

Second Progress Report

Windy City Cellular, LLC ("Windy City" or "the Company") is a very small Tier III wireless carrier that provides cellular voice and data services on Adak Island, a remote community in Alaska's Aleutian Islands. The Company is a minority and veteran-owned business that serves less than 50 mobile subscribers, but its services are extremely valuable to the citizens and businesses of Adak and roaming customers who visit the island. Due to the remoteness of its service area, the low population density, and the challenging weather and terrain, Windy City relies on the FCC's high cost funding programs to maintain its wireless network.

As of the date of this Second Progress Report, there are still no PSAPs authorized by the State of Alaska to serve Adak, and no full-time police officers stationed on the island. The City of Adak operates a fire and EMS facility that is limited to volunteer staffing only. No authorities responsible for emergency call response in Windy City's service area have requested that the Company provide Phase II Enhanced 911 ("E911") service. As a result, Windy City has neither procured nor installed the equipment and services necessary to generate Phase II Automatic Location Information ("ALI") or indoor location data, and we have filed with the FCC a request for temporary waiver of the Commission's indoor accuracy provisions and related reporting requirements.¹

Without prejudice to its pending waiver request, Windy City provides this Second Report to demonstrate the Company's awareness of and commitment to meeting the Commission's wireless E911 indoor location accuracy requirements once a PSAP or appropriate local emergency authority in the Company's service area is capable of utilizing such data and submits a formal request.

Please direct any questions concerning this report to our counsel, Mr. Cary Mitchell, of the law firm of Blooston Mordkofsky Dickens Duffy & Prendergast, LLP. He can be reached by telephone at (202) 828-5538, or by email at cary@bloostonlaw.com.

7/30/2018
Dated


Andilea Weaver

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¹ See Petition for Temporary Waiver of Windy City Cellular, LLC, PS Docket No. 07-114, filed May 30, 2017 ("Petition for Waiver").